

REMARKS

Claims 23-31, 33-45 and 47-91 and 93-100 are pending in the application and stand rejected under 35 U.S.C. 103 as being unpatenable over U.S. Patent No. 6,269,336 to Ladd in view of the article by Li, et al., "Multimedia Content Description in the InfoPyramid".

Applicants submit that at the very least, claims 23, 39 and 80 are patentable and non-obvious over the combination of Ladd and Li on the grounds that Ladd does not disclose or suggest a conversational browser or method for processing a CML docuemnt and rendering its conversational dialog in one or more of a plurality of user interface modalities, as essentially claimed in claims 23, 39 and 80.


Applicants gratefully acknowlede the Examiner's long awaited acknowledgment that with regard to claim 23, LADD fails to teaches a *CML file that comprises meta-information implementing a conversational dialog to enable interaction with the user in a plurality of user interface modalities including a GUI (graphic user interface) modality and speech modality*, to render the conversational dialog in one or more of the plurality of user interface modalities. It is readily clear that with regard to claim 39, LADD does not disclose or suggest, for example, *a content server comprising one of content pages, applications, and a combination thereof, wherein the content pages and applications are implemented using a conversational markup language (CML) to describe a conversational dialog for interaction with a user in a plurality of user interface modalities including a GUI (graphic user interface) modality and speech modality*. Moreover, with regard to claim 80, LADD clearly does not disclose or suggest, for example, *generating a request based on the processed input command to access a CML (conversational markup language) file from a content server, the CML file comprising meta-information to*

implement a conversational dialog in a plurality of user interface modalities including a GUI (graphic user interface) modality and speech modality.

However, Applicants respectfully contend that Li fails to cures the deficiencies of LADD in this regard. Li is irrelevant. Li discloses nothing more than a content description language for multimedia that improves searching, indexing and managing multimedia contents, where InfoPyramid facilitates search, retrieval, manipulation and transmision of mutlmitdiat data by providing a hierarchy of content descriptors in the context of MPEG. This disclosure is irrelevant, as the content description only relates to multimedial content description in the MPEG domain. Li teaches a method for describing multimedial content for the purpose of developing standard processing for developiong and publishing content descriptions (see, Introduction). The MPEG content description is simply not related to the process of parsing and *and interpreting a CML file or application to render the conversational dialog of such CML file/applocation in one or more of a plurality of user interface modalities* – converstional dialog rendering is different that MPEG content description.

For at least these reasons, claims 23, 39 and 80 are patentable and non-obvious over the combination of Ladd and Li. All pending dependent claims are patenable and non-obivous over said combination for at least the same reasons. The rejections should be withdrawn.

Respectfully submitted,


Frank V. DeRosa
Reg. No. 43,584
Attorney for Applicant(s)

F. Chau & Associates, LLC
130 Woodbury Road
Woodbury, New York 11797
TEL.: (516) 692-8888
FAX: (516) 692-8889